Attorney Docket No.: 103580.00024 / 2002P10173

Serial No.: 10/750,378 Amendment Dated: January 15, 2009

Reply to Office Action of: October 15, 2008

Page 6

## Remarks

As stated above, Applicants appreciate the Examiner's thorough examination of the subject application and request reexamination and reconsideration of the subject application in view of the preceding amendments and the following remarks.

As of the office action of October 15, 2008, claims 1-17 were pending in the subject application, of which claim 1 is an independent claim. With this response applicants have amended claim 1.

## A. 35 U.S.C. § 103 Rejections

The examiner rejects claims 1, 2, 5-7, and 9-16 under 35 U.S.C. § 103(a) over U.S. Patent Application Publication 2004/0167896 ("Eakin") in view of U.S. Patent Application Publication 2004/0078777 ("Bahrami"). Office Action page 2.

Applicant has amended independent claim 1. Claim 1 is generally directed toward building cross-functional applications. The amendments to claim 1 include the type of data that is used to build the cross-functional applications. For example, amended claim 1 includes an element where the system "accessing a database that includes data representing multiple enterprise functions." Amended claim 1. Amended claim 1 also contains an element that "build[s] components of cross-functional applications create cross-functional applications from the data representing multiple enterprise functions, wherein the cross-functional applications include pages that display the personal tasks and resources for users." Id.

Neither Eakin nor Bahrami contain the elements of amended claim 1. Eakin discloses a "content management" portal that connects a front end GUI to media stored in a database. Bahrami discloses a modeling application that allows a user to create models of business processes. Neither Eakin nor Bahrami appear to disclose building cross-functional applications, and neither appears to disclose using enterprise functions and user tasks and resources to build cross functional applications that include pages to display the user tasks and resources, as claimed in claim 1. The "models" of Bahrami are not analogous to the cross-functional applications of the subject application. The "models" are tools to "document work processes, model and simulate such processes, and [to be] exchanged . . . with workflows for execution of work processes." *Bahrami* ¶ 19. *Bahrami*'s models are distinct from the cross-functional applications of the subject invention because the models are test and simulation tools. *Id.* at ¶ 19, 37. In contrast, the cross-functional application of the subject application may be an application that "cross[es] over traditional application boundaries and handle[s] new business scenarios in a flexible and dynamic manner." *Subject Application* ¶ 39. Therefore a person of ordinary skill would not have been motivated to combine the references to come up with the claimed invention because the combination of the references does not result in the claimed invention. Accordingly, Applicants contend that independent claim 1, and dependent claims 2, 5-7, and 9-16 are patentable under 35 U.S.C. § 103 over Eakin and Bahrami.

The Examiner has also rejected claims 3 and 4 under § 103 over Eakin, Bahrami, and Wireless Application Protocol White Paper ("WAP"). *Office Action page 5.* WAP does not appear to disclose the elements of amended claim 1 discussed above. Therefore Applicants contend that claims 3 and 4 are patentable under § 103 because they are dependent upon amended claim 1 and incorporate all the limitations of amended claim 1.

The Examiner also rejects claims 8 and 17 under § 103 over Eakin, Bahrami, and U.S. Patent No. 7,260,617 ("Bazinet"). *Office Action page 6*. Bazinet does not appear to disclose the elements of claim 1 discussed above. Therefore Applicants contend that claims 8 and 17 are

Serial No.: 10/750,378 Attorney Docket No.: 103580.00024 / 2002P10173

Amendment Dated: January 15, 2009

Reply to Office Action of: October 15, 2008 Page 8

patentable under § 103 because they are dependent upon amended claim1 and incorporate all the limitations of amended claim 1.

In consideration of the amendments and foregoing discussion, the application is now believed to be in condition for allowance. Early allowance of the subject application is respectfully solicited.

This response is not believed to necessitate any additional fees. However, in the event that additional fees are due, please charge or credit any refund to our Deposit Account No. 50-2324.

Respectfully Submitted,

Dated: January 15, 2009

/Brian J Colandreo

Brian J Colandreo

Reg. No. 42,427

Holland & Knight LLP 10 St. James Avenue Boston, MA 02116-3889 Telephone 617-305-2143 Facsimile 617-523-6850

# 5990380\_v1